



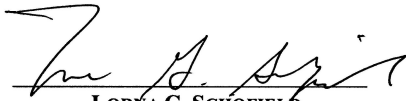
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February 24, 2023

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Application **granted in part**. Defendants' deadline to answer or otherwise respond to the Complaint is extended to **March 14, 2023**. The initial pretrial conference scheduled for March 1, 2023, is adjourned to **March 15, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **March 8, 2023, at 12:00 P.M.**

Via ECF


 LORNA G. SCHOFIELD
 UNITED STATES DISTRICT JUDGE

Dated: February 27, 2023
 New York, New York

Re: Cox, et al. v. Procida Construction Corp., et al. S.D.N.Y. No. 22-cv-10549 (LGS)

Your Honor:

Our firm represents Defendants in the above-captioned matter. We write, on consent of Plaintiffs, to request the following relief:

- Extension of Defendants' deadline to respond to the Complaint from February 27, 2023 to March 14, 2023 (as provided for in the parties' stipulation to extend time that Your Honor So Ordered, ECF No. 13).
- Extension of the case management plan submission deadline (3:00pm on February 24, 2023) to a date following March 14, 2023, and
- Adjournment of the initial conference (March 1, 2023) to a date and time following the rescheduled case management plan submission deadline.

This relief (sought with consent) is necessary, as we require additional time to complete our investigation of Plaintiffs' claims (which include allegations of prevailing wage violations on behalf of multiple plaintiffs), and to consult with our clients, in order to prepare Defendants' response to the Complaint and negotiate a case management plan with our adversaries. Likewise, we believe a brief adjournment of the initial conference until after the deadline to respond to the Complaint is appropriate in view of the foregoing and warranted in the interest of judicial efficiency.

This is the first request for the relief stated above. We apologize for the parties' unfortunate oversight with respect to the missed case management plan deadline earlier in the week, and thank Your Honor for considering this consented application.

Respectfully Submitted,
KAUFMAN DOLOWICH & VOLUCK, LLP

By: 
 Taimur Alamgir

cc: Plaintiff's counsel (via ECF)